



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, California

VIA EMAIL AND U.S. MAIL

July 5, 2011

Edward Modiano
OPOG Project Coordinator
de maximis, inc.
1322 Scott Street, Suite 104
San Diego, CA 92106

Re: EPA comments on OPOG's response to EPA Comments on ROP/WCC As-Built Report,
received on January 10, 2011

Mr. Modiano:

EPA has completed its review of OPOG's revised SSD as-built submittal prepared by JHA Environmental, Inc, dated April 25, 2011.

Background: OPOG submitted an As-Built Report for the Sub-Slab Depressurization for Soil Gas Treatment at Women & Children's Crisis Shelter and Regional Occupation Programs on September 13, 2010. EPA provided comments on November 30, 2010. On January 10, 2011: OPOG provided supplemental documents (Formal Responses to the EPA November 30, 2010 comments; Revised As-built report prepared by Jacob & Hefner dated December 15, 2010; SSD Health Risk Assessment Memorandum dated December 15, 2010; and SSD data tables). EPA provided OPOG with comments on January 31, 2011.

The SSD system was modified in December 2010 and again in March 2011.

OPOG submitted revision 2 of the as-built report, dated April 25, 2011. EPA has completed its review of that document and finds it generally satisfactory; however, the following clarifications and typographical corrections should be made:

1. Please revise all text to reference the correct facility name: Women's and Children's Crisis Shelter (WCCS), not Women's Crisis Center.
2. Page 2, Sub-Slab Depressurization Blowers and Suction Pits. Please refer to Figure 3 instead of Figure 2 in the first sentence of this section because Figure 3 shows the building room numbers associated with each SSD pit.

3. Page 2, Sub-Slab Depressurization Blowers and Suction Pits. Please revise the second sentence in this section to read as: *There are a total of eighteen (18) suction pits located as follows*; the current text incorrectly states there are only 11 suction pits.
4. Page 6, Sub-Slab Depressurization Vacuum Monitoring Points. Please refer to Figure 3 instead of Figure 2 in the first sentence of this section because Figure 3 shows the building room numbers associated with each SSDVMP.
5. Page 6, Sub-Slab Depressurization Vacuum Monitoring Points. Please revise the second sentence in this section to read as: *There are a total of sixteen (16) SSDVMPs and are located as follows*; the current text incorrectly states there are only 11 SSDVMPs.
6. Page 6, Sub-Slab Depressurization Vacuum Monitoring Points. Please add the following wording shown in italics below for SSDVMP-10 to provide more clarification:
 - SSDVMP-10 is located in the Dental Annex *and was converted to SSDB-18*;
7. Page 6, Sub-Slab Depressurization Vacuum Monitoring Points. The current list of SSDVMPs shows nineteen monitoring points; however, three of these points have been converted to SSDs (e.g. SSDVMP-8 to SSDB-9, SSDVMP-9 to SSDB-10, and SSDVMP-10 to SSDB-18). To eliminate confusion, please show the 16 SSDVMPs in the main bullet list and show the three former SSDVMPs that have been converted to SSDBs perhaps as a separate grouping below the main bullet list of SSDVMPs.
8. Please submit revised as-builts once the planned 55-gallon carbon vessel for treating effluent from SSDB-17 has been installed as recommended in the Short Term Mitigation Air Sampling Report for March 2011 (page 18) dated May 3, 2011. Please evaluate whether addition of the planned carbon vessel will provide sufficient treatment. Please evaluate whether additional carbon vessels will be required.

Please provide a revised document, including two hard copies to EPA, within 14 days or by July 20, 2011.

If you have any questions about this letter, please contact me at (415) 947-4183.

Sincerely,



Lynda Deschambault
Superfund Remedial Project Manager

Cc VIA EMAIL:

Stephanie Lewis, California EPA Department of Toxic Substances Control
Tom Perina, Ch2MHill